

City of Long Beach  
Department of Health  
and Human Services

Los Angeles County  
Department of Public Health

City of Pasadena  
Public Health Department

Riverside University  
Health System – Public Health

Santa Barbara County  
Public Health Department

County of San Bernardino  
Department of Public Health

County of San Diego  
Health and Human Services  
Agency

Ventura County  
Public Health

Bill Jahn, President  
Regional Council  
Southern California Association of Governments  
900 Wilshire Blvd., Ste. 1700  
Los Angeles, CA 90017

January 24, 2020

RE: Comments on Connect SoCal 2020-2045 Regional Transportation Plan and Sustainable Communities Strategy

Dear President Jahn:

The [Public Health Alliance of Southern California](#) (Alliance) is a coalition of executive leadership of local health departments in Southern California. Collectively, our members have statutory responsibility for the health of nearly 50% of California's residents. We focus on multi-sector policy, systems and environmental change to improve population health and equity.

Our health departments are committed to realizing a vision in which all Southern California communities are vibrant and activated communities achieving health, justice and opportunities for all. We have been active participants in development of the Connect SoCal 2020-2045 Regional Transportation Plan and Sustainable Communities Strategy ("the Plan") as part of our efforts to achieve this goal. We regularly participate in several of the Regional Planning Working Groups and have provided feedback throughout the development of the Plan, including the Active Transportation, Public Health, Environmental Justice, Transportation Safety, Climate Adaptation and Resilience and Technical Working Groups. We are very pleased to see such a strong emphasis on public health, health equity, and climate vulnerability in this draft Plan compared to previous plans, and are committed to working with you and SCAG staff to ensure implementation of this Plan.

With that in mind, we offer the following comments on the draft Plan for your consideration.

### **Overarching Comments**

Every 4 years, we are pleased to see SCAG make considerable progress on better incorporating public health, health equity and climate change into its Plan. This draft Plan represents a transformative shift in our region's transportation investments to create healthier, more equitable, and climate resilient communities. We are pleased to see that the plan does the following:

- Takes a Health in All Policies approach to Public Health, focusing on the social determinants of health and integrating public health considerations into all elements of the Plan.
- Includes overarching goals focused on improving public health (Goal #6, Support healthy and equitable communities) and addressing climate change (Goal #7, Adapt to a changing climate and support an integrated regional development pattern and transportation network")

- Invests almost double the amount of funding in active transportation (\$22.5 billion) compared to the previous plan (\$12.9 billion). These additional investments in walking and bicycling infrastructure and programs will have a significant impact on our region's health and well-being.
- Projects increasing active transportation mode share from 8.3% to 10.2% by 2045.
- Continues support for non-infrastructure active transportation programs such as Go Human, Safe Routes to School and local transportation safety efforts, both in-house at SCAG and in the region's local health departments and other government agencies.
- Meets the greenhouse gas emissions reductions targets established for the region by Senate Bill 375 (8% in 2020, 19% in 2035) and reduces vehicle miles traveled per capita by 4.5%.
- Provides quantifiable performances of health impacts from implementing the Plan by 2045, including health care cost savings (\$350 million for chronic disease related incidences, \$138 million for air quality-related incidences), reduced incidences of chronic disease (80,000 combined cases for high blood pressure, heart disease and type 2 diabetes), active transportation mode share (22% increase in walking and 50% increase in biking), and air quality improvements (3.8% reduction in PM<sub>2.5</sub> emissions) .
- Includes a robust Public Health Technical Report with robust data on how the Plan will improve health outcomes, including baseline data and projections to 2045.
- Provides a strong list of actionable strategies for local communities to elevate public health, equity and climate change in their planning efforts. The Alliance worked with SCAG staff through its participation in the Public Health Working Group to refine these strategies and are pleased to see our recommendations have been incorporated.
- Provides an inventory of local communities that have created plans with a strong public health framing, as well as those that have created active transportation plans. This will be a highly useful resource to our local health departments and partners in ensuring we are coordinated in our planning and where we could fill important gaps.
- Utilizes the Alliance's California Healthy Places Index in multiple sections, including maps of the region showing HPI scores, life expectancy, the social determinants of health and specific chronic disease rates.

### **Recommendations for Strengthening the Plan**

While we are encouraged by all of the above, the Plan could be strengthened in the following ways:

#### **Incorporating the [California Healthy Places Index \(HPI\)](http://www.healthyplacesindex.org) in Additional Sections of the Plan**

- The [California Healthy Places Index \(HPI\)](http://www.healthyplacesindex.org), available at [www.healthyplacesindex.org](http://www.healthyplacesindex.org), is a data and mapping tool developed by the Alliance that allows users to explore underlying local factors associated with life expectancy and to compare community conditions statewide, at multiple geographies down to the Census tract level. The HPI provides overall scores for communities and more detailed data on specific policy action areas that address the social determinants of health, such as housing, economic opportunity, education, transportation, neighborhood characteristics, and more. The HPI is currently used by nearly 90 agencies, businesses and community groups using HPI to integrate public health into their work, and more than \$450 million in funding has been made available for regional and State grant programs using HPI, including SCAG as part of its SCAG's own [Sustainable Communities Grants application](#).
- We are encouraged to see maps and data from HPI in several sections of the Plan, including the Active Transportation Technical Report, and have been encouraged by SCAG using HPI as part of its Sustainable Communities Planning Grant selection criteria. However, the Public Health Technical Report only includes a mention of HPI on page 13 without use of the data in any tables, maps or other visualizations like other datasets. Given the Plan's focus on the social determinants of health and health equity, we recommend incorporating HPI score maps, as well as maps of several of the indicators and decision support layers that represent the social determinants of health that are the focus of the Public Health Technical Report, such as housing (Housing Policy Action Area indicators), air quality (Environment Policy Action Area indicators),

economic opportunity (Economic Policy Action Area indicators) and Climate Change (Climate Vulnerability decision support layers). We also recommend adding tables with additional public health information available in HPI to the Technical Report. This will ensure that the implementers of this Plan have a wide range of information available as they consider public health and health equity impacts of their decision-making in the region.

- HPI scores should be added as an additional “Environmental Justice Area” in the Environmental Justice Technical Report. HPI scores are available at similar geographies to these existing maps and can provide an additional health equity lens to the Environmental Justice analysis and help with identification of disadvantaged communities and where cities and counties in the region should be prioritizing investments to address environmental justice issues that intersect with health equity issues.
- We also recommend reviewing and incorporating the strategies and policies identified in the 30 [HPI Policy Action Guides](#) in several sections: the Environmental Justice Toolbox, which is lacking many examples from a public health and health equity perspective, as well as the Strategies sections of Active Transportation and Public Health Technical Reports.

### **Greater Alignment of the Environmental Justice Technical Report with Other Parts of the Plan**

- The performance measures in the Environmental Justice Technical Report should provide quantifiable targets like the rest of the Plan, instead of directional measures of “Improve” or qualitative descriptions.
- We appreciate the inclusion of the General Plan Elements (GPE) discussion and icons throughout the Environmental Justice Technical Report to support the SB 1000 requirement. However, in order to support progress and alignment throughout the SCAG region, we recommend including a strategy that outlines a process for cities and counties to amend their General Plans to reflect the goals and strategies in Connect SoCal, especially those in the Environmental Justice Technical Report. This will ensure greater consistency between local and regional plans, which is often a requirement for State grant funding.
- The Environmental Justice Technical Report should more explicitly align with other sections of the Plan that focus on equity. For example, the Public Health Technical Report focuses on the Social Determinants of Health yet these are barely mentioned in the Environmental Justice Technical Report. In order to promote greater coordination and collaboration between the practitioners and stakeholders who will ultimately be responsible for implementing this plan, these sections should be better aligned and reflect the data, strategies, goals and other elements identified in each section.
- As mentioned above, data from the [California Healthy Places Index](#), as well as the California Department of Public Health’s [Climate and Health Vulnerability Indicators](#) should be incorporated in this section when discussing public health and climate vulnerability, respectively. Currently, only CalEnviroScreen 3.0 is used to analyze these topics, which is inconsistent with the reference to the California Healthy Places Index and Climate and Health Vulnerability Indicators in with the Public Health, Active Transportation and other sections of the Plan.
- In order to improve the readability of the Technical Report we recommend greater clarity between the narrative and summary statements and the specific data tables. For example, the narrative on page 3 states “regional and local emissions impact shows adverse impacts at the local level for certain regions but improvements at a regional level,” however Table 1 *Emissions Impact Analysis* appears to show improvement for all EJ areas, it is unclear whether the adverse impacts at the local level are due to freeway and roadway exposure or not. Similarly, the Technical Report narrative states that “EJ communities incur a higher risk of adverse impacts for active transportation hazards, climate vulnerability and public health,” but the summary in Table 1 only provides narrative on *current conditions* for these topics. We recommend adding detail on specific geographic areas where these impacts will occur, and providing a clearer understanding on the connection between the Plan components and any potential negative outcomes for EJ communities.

- In order to provide additional clarity on the findings on emissions impacts, the Technical Report could include more narrative to explain the findings in Tables 41-44; in one section the analysis states “COC areas show *less improvement* in CO and PM2.5 compared to the region,” however page 123 says there will be areas that experience *increases* in PM 2.5 and CO emissions due to the plan. We recommend including additional narrative to clarify the issue.

### **Elevated Discussion of Climate Change**

- We are pleased to see an elevated focus on climate change compared to the last Plan. However, we recommend that SCAG consider creating a standalone Technical Report devoted to Climate Change in order to provide specific data and strategies for addressing climate change in the SCAG region. Review and incorporation of jurisdiction climate action plans, climate adaptation plans, and/or sustainability plans may help guide the development of a Climate Change Technical Report. In addition, the discussion of climate change focuses on a narrow set of climate-related events such as wildfires and sea level rise. These discussions could benefit from a broader focus on climate adaptation and resilience, especially how they relate to the changing demographics of the region.
- In the Public Health Technical Report under the Climate Change Expanded Analysis Section there should be greater emphasis on the importance of active transportation and public transit accessibility as a community climate resilience and health equity strategy, not solely as a climate mitigation strategy (via VMT reduction). Additionally, we recommend the inclusion of an analysis of the potential cost savings of more resilient active transportation and public transit systems in the projected climate scenarios.
- In order to further address the nexus between public health, regional transportation plans, and climate change, we recommend explicitly addressing the public health risks of active transportation modes during extreme heat events, poor air quality days, and wildfire season. Similarly, we recommend including consideration of the importance of transportation needs, especially evacuation protocols, of vulnerable populations (e.g. elderly, disabled, socially isolated) during a climate- related event.
- In order to increase the emphasis on the climate adaptation and resilience, we recommend including current regional, local, and community-based climate resilience efforts within the Existing Conditions section, specifically the sub-sections that are directly related to climate change (e.g. Access to Parks and Open Space, Air Quality, Smoke and Wildfires, etc.). Similarly, we recommended the inclusion of more specific data related to the disproportionate burden faced by low-income and communities of color due to current and future climate impacts (e.g. poor air quality, asthma rates, homes in inundation areas, etc.).
- We applaud the thoughtful consideration of the plan implementation strategies and actions. We propose the inclusion of HPI as a strategic tool to further Strategy 2, Action D. In order to advance the goals of Strategy 2 for Local Jurisdictions and Partners, and Strategies throughout the Plan and Technical Reports, we recommend including explicit language about providing financial support to community-based partners and community members for their engagement in stakeholder meetings and coalitions throughout the continued refinement, implementation, and evaluation of the Plan.

### **Greater Investments in Active Transportation:**

- Active transportation investments, which are almost double compared to the previous Plan, still represent a small percentage (approximately 3.5%) of the overall Plan. While this reflects available funding for active transportation and is aligned with current mode shares, it is still an insufficient amount to increase the number of people walking and bicycling in the region, and more investments will be needed to meet the region’s SB 375 targets. We urge SCAG and its members to identify additional ways to invest in active transportation to support a healthier region, and to identify strategies to increase support in areas where these projects are facing opposition.

## Data Collection

- We applaud the inclusion of Safety and Health measures in the overall Plan Performance measures, particularly the “Daily amount of walking and biking related to work and non-work trips” and the “Collision rates by severity and mode.” We encourage cities and counties to collaborate with SCAG, Public Safety Departments, Caltrans, and Public Health Departments to improve the collection of data to track these metrics over time at a granular level. Data collection will be particularly important in tracking the impacts and benefits of the plan to Environmental Justice communities where greater numbers of residents are reliant on active transportation modes.
- In order to provide more information and context to local jurisdictions, we recommend including additional data and evaluation strategies related to the impacts of active transportation, including; an analysis and model of the safety impacts of active transportation; a return on investments analysis for investments in active transportation infrastructure and technology; and a recommendation to systematically install automated counters along bike paths and other active transportation thoroughfares.
- We also urge SCAG to establish more meaningful targets for many of the goals in the Plan other than “improvement over baseline.” While the Plan touts the benefits of making the proposed transportation investments, this Plan covers a long range of time where more ambitious targets could be established and strived for by SCAG and its member cities and counties. The target-setting process for the Federal Highway Administration’s Safety Performance Measures was a good standard to follow and should be considered for other goals in the Plan, so we have greater accountability for meeting these goals.

Thank you for taking the time to consider our comments. We are happy to offer any assistance on incorporating the California Healthy Places Index in additional sections of the Plan, as well as addressing on public health, health equity or climate change as you implement Connect SoCal. Should you have any questions or clarifications on the recommendations offered above, please contact Tracy Delaney, Executive Director of the Alliance at [tdelaney@phi.org](mailto:tdelaney@phi.org) or (619) 722-3403.

Sincerely,



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